IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*,[1] Debtors.	Chapter 11 Case No. 26-10371 (TMH) (Jointly Administered) **Obj. Deadline: September 8, 2026 at 4:00 p.m. (ET)** **Hearing Date: October 14, 2026 at 10:00 a.m. (ET)**

SECOND MOTION FOR ENTRY OF AN ORDER EXTENDING TIME PERIOD WITHIN WHICH THE GUC TRUSTEE MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452

By this motion (the "Motion"), David Dunn, as the GUC Trustee of the Reliz Liquidating Trust (the "GUC Trustee"), seeks entry of a proposed order, substantially in the form attached hereto as **Exhibit A**, extending the period within which the GUC Trustee may remove actions (the "Removal Period") pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). In support of this Motion, the GUC Trustee respectfully states as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

1 The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identification numbers, are: Reliz Technology Group Holdings Inc. (6265); Reliz Technologies LLC (1968); Reliz LTD (N/A); and Reliz CI LTD (N/A). The Debtors' service address is 401 West Ontario St., Suite 400, Chicago, IL 60654.

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2. The legal predicates for the relief requested herein are section 1452 of title 28 of the United States Code, Rules 9006 and 9027 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 9006-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules").

3. The GUC Trustee confirms his consent, pursuant to Local Rule 9013-1(f), to the entry of a final order by the Court in connection with the Motion in the event that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

BACKGROUND

4. On March 15, 2026 (the "Petition Date"), each Debtor commenced a case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code (collectively, the "Chapter 11 Cases") in the Court.

5. On May June 8, 2026, the Debtors filed the *Motion of the Debtors for Entry of Order Extending Time Period Within Which Debtors May Remove Actions Pursuant to 28 U.S.C. §§ 1452* [Docket No. 410] (the "Original Extension Motion"). On June 24, 2026, the Court granted the Original Extension Motion, which extended the deadline to remove actions from June 13, 2026 to September 11, 2026 [Docket No. 459].

6. On July 13, 2026, the Court entered the *Findings of Fact, Conclusions of Law, and Order Confirming the Second Amended Joint Chapter 11 Plan of Reliz Technology Group Holdings Inc. and its Debtor Affiliates* [Docket No. 527], which confirmed the *Second Amended Joint Chapter 11 Plan of Reliz Technology Group Holdings Inc. and its Debtor Affiliates* [Docket No. 510-1] (amended, supplemented, or otherwise modified, the "Plan").

7. On July 28, 2026, the Plan went into effect in accordance with its terms. *See Notice of (I) Entry of Order Confirming the Second Amended Joint Chapter 11 Plan of Reliz Technology Group Holdings Inc. and its Debtor Affiliates; (II) Occurrence of Effective Date of the Plan; (III) Substantial Consummation of the Plan; and (IV) Certain Bar Dates* [Docket No. 542].

8. Additional factual background and information regarding the Debtors, including their business operations, their corporate and capital structure, their restructuring activities, and the events leading to the commencement of the Chapter 11 Cases, is set forth in detail in the *Declaration of Mark Renzi in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 3], which is incorporated herein by reference.

THE ACTIONS

9. On April 11, 2026, the Debtors filed their Schedules of Assets and Liabilities and Statements of Financial Affairs (as amended, the "Schedules and Statements"). As part of the Schedules and Statements, the Debtors identified certain civil actions commenced before the Petition Date (the "Prepetition Actions") of which the Debtors were then aware. Additionally, if commenced in compliance with the exceptions to the automatic stay imposed by section 362 of the Bankruptcy Code (which remains in effect pursuant to Article VIII.I of the Plan), parties may commence civil actions against the Debtors during the pendency of the Chapter 11 Cases (the "Postpetition Actions," and together with the Prepetition Actions, the "Actions").[2] The Actions may be subject to removal pursuant to 28 U.S.C. § 1452. The GUC Trustee is continuing to analyze the existence of any Actions, as well as any filed proofs of claim, to determine whether to

[2] For the avoidance of doubt, the Debtors reserve all rights with respect to whether any Postpetition Actions were commenced in compliance with the exceptions to the automatic stay imposed by section 362 of the Bankruptcy Code, or otherwise.

remove any Actions. Thus, the GUC Trustee files this Motion out of an abundance of caution to further extend the removal deadline.

RELIEF REQUESTED

10. By this Motion, the GUC Trustee requests the entry of an order, pursuant to Rule 9006(b) of the Bankruptcy Rules, extending the time period (the "Removal Period") by which the GUC Trustee may file notices of removal with respect to any civil actions to the later of (a) ninety (90) days from the current deadline[3], through and including December 10, 2026, without prejudice to the GUC Trustee's right to seek further extensions. The Removal Period currently expires on September 11, 2026.

BASIS FOR RELIEF

11. Section 1452 and Rule 9027 of the Bankruptcy Rules govern the removal of pending civil actions. Specifically, Section 1452(a) provides:

> A party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a governmental unit to enforce such governmental unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title.

28 U.S.C. § 1452(a). Bankruptcy Rule 9027(a)(2) sets forth the time periods for filing notices to remove claims or causes of action and provides, with regard to prepetition actions, in pertinent part:

> If the claim or cause of action in a civil action is pending when a case under the [Bankruptcy] Code is commenced, a notice of removal may be filed only within the longest of (A) 90 days after the order for relief in the case under the [Bankruptcy] Code, (B) 30 days after entry of an order terminating a stay, if the claim or cause

[3] Pursuant to Del. Bankr. L.R. 9006-2, the filing of this Motion prior to the Current Deadline shall serve to automatically extend the Current Deadline without the necessity for the entry of a bridge order, until the Court rules on this Motion. *See* Del. Bankr. L.R. 9006-2.

> of action in a civil action has been stayed under § 362 of the [Bankruptcy] Code, or (C) 30 days after a trustee qualifies in a chapter 11 reorganization case but not later than 180 days after the order for relief.

Fed. R. Bankr. P. 9027(a)(2). With respect to postpetition actions, Bankruptcy Rule 9027(a)(3) provides, in pertinent part:

> If a claim or cause of action is asserted in another court after the commencement of a case under the [Bankruptcy] Code, a notice of removal may be filed with the clerk only within the shorter of (A) 30 days after receipt, through service or otherwise, of a copy of the initial pleading setting forth the claim or cause of action sought to be removed, or (B) 30 days after receipt of the summons if the initial pleading has been filed with the court but not served with the summons.

Fed. R. Bankr. P. 9027(a)(3).

12. Bankruptcy Rule 9006(b) provides that the court may extend unexpired time periods, such as the removal period, without notice:

> [W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order . . . .

Fed. R. Bankr. P. 9006(b)(l).

13. The GUC Trustee believes that it is prudent to seek an extension of the time to file notices of removal in order to protect the GUC Trustee's right to remove the Actions. Since the filing of the Prior Extension Motion, the GUC Trustee has worked diligently on a number of critical matters but has not yet determined which Actions, if any, the GUC Trustee may seek to remove. Among other things, the GUC Trustee and his professionals have been predominately focused on investigating potential claims and causes of action that might serve as a source of recovery for creditors, in addition to dealing with other emergent issues.

14. The GUC Trustee is seeking to extend the Removal Period deadline under Bankruptcy Rule 9027(a)(2)(A), which would otherwise expire on September 11, 2026, to ensure the GUC Trustee's right to remove is preserved and that creditors are on notice of such extended removal deadline.

15. The GUC Trustee's decision regarding whether to seek removal of any particular Action depends on a number of factors, including: (a) the importance of the Action to the resolution of the Chapter 11 Cases; (b) the time required to complete the Action in its current venue; (c) the presence of federal subject matter jurisdiction in the proceeding that may allow one or more aspects thereof to be heard by a federal court; (d) the relationship between the Action and the matters to be considered in connection with the GUC Trust's liquidation of the Debtors' estates and distributions in accordance with the Plan; and (e) the progress made to date in the applicable Action. Accordingly, to make the appropriate determination as to whether they should seek removal, the GUC Trustee must analyze each Action following the full consideration of the foregoing factors.

16. For the reasons set forth above, however, the GUC Trustee has still not yet had the opportunity to properly consider, or make decisions concerning, the removal of the Actions. Accordingly, the GUC Trustee requests that the Court extend the Removal Period as set forth herein, without prejudice to the GUC Trustee's right to seek further extensions. This second extension of time for removing Actions sought in this Motion will afford the GUC Trustee the opportunity necessary to make fully informed decisions concerning removal of any Actions and will assure that the GUC Trust does not forfeit valuable rights under Section 1452.

17. Further, the rights of any party to the Actions will not be unduly prejudiced by the GUC Trustee's requested extension. Inasmuch as section 362(a) of the Bankruptcy Code

automatically stays actions against the GUC Trustee, most of the Actions will not proceed in their respective courts during its chapter 11 case, even absent the relief requested herein. Moreover, if the GUC Trustee ultimately seeks to remove any Action pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027, any party to such Action may seek to have such Action remanded pursuant to 28 U.S.C. § 1452(b), which provides that "[t]he court to which such claim or cause of action is removed may remand such claim or cause of action on any equitable ground." 28 U.S.C. § 1452(b). Importantly, the relief requested herein does not alter any party's rights under 28 U.S.C. § 1452(b) to seek a remand. Accordingly, the GUC Trustee submits that cause exists for the relief requested herein.

18. It is well established that this Court has authority to grant the relief requested and extend the Removal Period as requested herein. *See, e.g., Pacor, Inc. v. Higgins*, 743 F.2d 984, 996 n.17 (3d Cir. 1984) (holding that the bankruptcy court's power to grant an extension of the removal period pursuant to Bankruptcy Rule 9006(b) is "clear"), *overruled on other grounds by Things Remembered, Inc. v. Petrarca*, 516 U.S. 124 (1995); *Jandous Elec. Constr. Corp. v. City of New York* (*In re Jandous Elec. Constr. Corp*.), 106 B.R. 48, 50 (Bankr. S.D.N.Y. 1989) (holding that the period in which to file motion to remove may be expanded pursuant to Bankruptcy Rule 9006); *In re World Fin. Servs. Ctr., Inc*., 81 B.R. 33, 39 (Bankr. S.D. Cal. 1987) (indicating that the United States Supreme Court intended to give bankruptcy judges the power to enlarge the filing period under Bankruptcy Rule 9027(a) pursuant to Bankruptcy Rule 9006(b)); *Raff v. Gordon*, 58 B.R. 988, 990 (E.D. Pa. 1986) (holding that an expansion of time to file notices of removal is authorized under the Bankruptcy Rules); 10 Collier on Bankruptcy ¶ 9027.05[1] (16th ed. 2020) ("Subdivisions (b) and (c) of Rule 9006 permit the periods of time of Rule 9027(a)(2) to be reduced or extended.").

19. The GUC Trustee submits that this request to further extend the deadline for removing the Actions is reasonable and practical in light of the present posture of the Chapter 11 Cases. Accordingly, the GUC Trustee respectfully submits that the relief sought is in the best interests of creditors.

RESERVATION OF RIGHTS

20. The GUC Trustee reserves the right to seek further extensions of the period in which they may remove civil actions pursuant to Bankruptcy Rule 9027.

NOTICE

21. Notice of this Motion has been provided to the following parties, or, in lieu thereof, their counsel: (i) the U.S. Trustee; (ii) counsel to the Debtors; and (iii) any other party entitled to receive notice pursuant to Bankruptcy Rule 2002. The GUC Trustee submits that, in view of the facts and circumstances, such notice is sufficient and no other or further notice needs to be provided.

WHEREFORE, the GUC Trustee respectfully requests that the Court enter the proposed order, substantially in the form attached to this Motion as **Exhibit A**, and grant such other and further relief as may be appropriate.

Dated: August 24, 2026
Wilmington, Delaware

MORRIS JAMES LLP

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Counsel to David Dunn, as the GUC Trustee of the Reliz Liquidating Trust

Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*,[1]	Case No. 26-10371 (TMH)
	(Jointly Administered)
Debtors.	**Re: Docket No. __**

ORDER FURTHER EXTENDING TIME PERIOD WITHIN WHICH THE GUC TRUSTEE MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452

Upon the motion (the "Motion")[2] of the GUC Trustee of the Reliz Liquidating Trust (the "GUC Trustee") for entry of an order (this "Order") extending the period within which the GUC Trustee may remove actions pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), as more fully set forth in the Motion; and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the hearing, if any, to consider the relief requested herein (the "Hearing") having been provided to the parties provided for in the Motion and no further notice being necessary; and the legal and factual bases set forth in the Motion establishing just and sufficient cause to grant the relief requested therein; and the relief granted herein being in the best

[1] The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identification numbers, are: Reliz Technology Group Holdings Inc. (6265); Reliz Technologies LLC (1968); Reliz LTD (N/A); and Reliz CI LTD (N/A). The Debtors' service address is 401 West Ontario St., Suite 400, Chicago, IL 60654.
[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

interests of the GUC Trust, their estates, creditors, and all parties in interest; and upon all of the proceedings before the Court; and upon due deliberation given, it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The Motion is granted as set forth herein.

2. The period during which the GUC Trustee may file a notice of removal with respect to the Actions is extended until the later of (a) December 10, 2026, or (b) 30 days after entry of an order terminating the automatic stay with respect to any particular Action sought to be removed.

3. The extension granted by this Order is without prejudice to the GUC Trustee's right to seek further extensions of the time to remove the Actions upon application to this Court.

4. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

5. Nothing in this Order shall be construed as modifying or terminating any stay applicable to any act, action, or proceeding pursuant to Bankruptcy Code section 362.

6. The GUC Trustee is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

7. This Court shall retain jurisdiction over all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*,[1]	Case No. 26-10371 (TMH)
	(Jointly Administered)
Debtors.	**Obj. Deadline: September 8, 2026 at 4:00 p.m. (ET)** **Hearing Date: October 14, 2026 at 10:00 a.m. (ET)**

NOTICE OF SECOND MOTION FOR ENTRY OF AN ORDER EXTENDING TIME PERIOD WITHIN WHICH THE GUC TRUSTEE MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452

PLEASE TAKE NOTICE that on August 24, 2026, David Dunn, as the GUC Trustee of the Reliz Liquidating Trust (the "GUC Trustee"), filed the *Second Motion for Entry of an Order Extending Time Period Within Which the GUC Trustee May Remove Actions Pursuant to 28 U.S.C. § 1452* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, filed with the Court on or before **September 8, 2026 at 4:00 p.m. (ET) (the "Objection Deadline").** At the same time, you must also serve a copy of the responses upon GUC Trustee's undersigned counsel.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion will be scheduled for **October 14, 2026 at 10:00 a.m. (ET) (the "Hearing")** before the Honorable Thomas M. Horan, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Courtroom #7, Wilmington, Delaware 19801.

IF NO OBJECTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH PLEADINGS WITHOUT FURTHER NOTICE OR HEARING.

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Dated: August 24, 2026
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Eric J. Monzo
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Counsel to David Dunn, as the GUC Trustee of the Reliz Liquidating Trust

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*,[1]	Case No. 26-10371 (TMH)
	(Jointly Administered)
Debtors.	

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of August, 2026, I caused to be served a true and correct copy of the *Second Motion for Entry of an Order Extending Time Period Within Which the GUC Trustee May Remove Actions Pursuant to 28 U.S.C. § 1452* upon the parties that are registered to receive notice via the Court's CM/ECF notification system, and additional service was completed via electronic mail on the parties listed on the attached service list.

/s/ Eric J. Monzo
Eric J. Monzo (DE Bar No. 5214)

1 The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identification numbers, are: Reliz Technology Group Holdings Inc. (6265); Reliz Technologies LLC (1968); Reliz LTD (N/A); and Reliz CI LTD (N/A). The Debtors' service address is 401 West Ontario St., Suite 400, Chicago, IL 60654.

Service List

Description	CreditorName	CreditorNoticeName	Email
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US Trustee for District of DE	Office of the United States Trustee Delaware	Benjamin Hackman	USTPRegion03.WL.ECF@USDOJ.GOV; benjamin.a.hackman@usdoj.gov
Post Effective Date Debtors	Reliz Technology Group Holdings Inc.	Joe Perry, Interim Chief Executive Officer	joe.perry@blockfills.com
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